

Attorney Declaration of Lyle D. Rowen  
Case No. 23-cv-3652 (VSB)(SLC)

**EXHIBIT A**

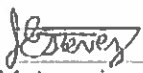
DATED: March 16, 2021  
RE: 350 West 53<sup>rd</sup> Street

RAB#: 210296

STIPULATION OF AGREEMENT

IT IS HEREBY UNDERSTOOD AND AGREED BETWEEN THE UNDERSIGNED PARTIES THAT:

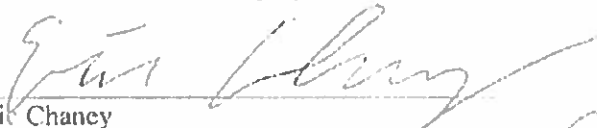
1. Lumiere Condominium("Employer") agrees to convert the indefinite suspension of Eric Chaney, without pay, effective February 25, 2021, to a suspension of time served out of work, without pay, in full and final settlement of any and all claims and/or amended claims Eric Chaney filed with Local 32BJ, to date. Eric Chaney will return to work on or after Tuesday, March 23, 2021.
2. This Stipulation will also serve as a Final Warning to Eric Chaney regarding any further disciplinary infraction in his employment. If Eric Chaney commits another disciplinary infraction or violates any further building policy or procedure, his employment will be terminated. If Eric Chaney is terminated under this paragraph, the Employer need only prove that the event giving rise to the discipline occurred, by a preponderance of the evidence, and the Arbitrator will not have jurisdiction to modify the discipline imposed.
3. Local 32BJ withdraws with prejudice and shall not grieve any and all claims arising from and/or related to Eric Chaney's employment with Employer, to date.
4. Eric Chaney withdraws with prejudice and shall not grieve any and all claims under the Collective Bargaining Agreement arising from and/or related to his employment with Employer, to date.

  
AKAM Associates, Inc., as Agent for  
Lumiere Condominium

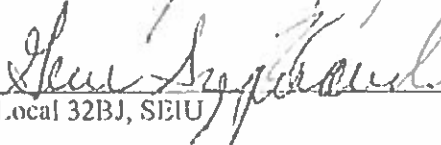
Date: 3/25/2021

  
Realty Advisory Board on Labor Relations,  
Inc.

Date: 5/13/2021

  
Eric Chaney

Date: 3/19/21

  
Local 32BJ, SEIU

Date: 3/19/21